

**REMARKS**

Applicants appreciate the Examiner's thorough consideration provided the present application. Claims 1, 4-7 and 10-15 are now present in the application. Claim 5 has been amended. Claims 1 and 7 are independent. Reconsideration of this application, as amended, is respectfully requested.

**Claim Rejections Under 35 U.S.C. §112**

Claim 5 stands rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. This rejection is respectfully traversed.

In view of the foregoing amendments, it is respectfully submitted that this rejection has been addressed. In particular, in the text generation step, the word insertion means uses a learning model to determine whether there is a word to be inserted between any two keywords in all arrangements of the keywords. The specification on page 6, lines 3-10 also discusses this step. Accordingly, all pending claims are now definite and clear. Reconsideration and withdrawal of the rejection under 35 U.S.C. § 112, second paragraph, are therefore respectfully requested.

**Claim Rejections Under 35 U.S.C. § 102**

Claims 1, 4-7 and 10-15 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Micher, U.S. Patent No. 7,177,797. This rejection is respectfully traversed.

Independent claim 1 recites “[a] text generation method for generating *a text including a sentence*, comprising: an input step for inputting at least a word as a keyword through input means, an extracting step for extracting *a text including one or more keywords* from a database through extracting means, and a text generation step for generating an optimum text based on the extracted text by text generation means, wherein *parser means morphologically analyzes and parses the extracted text to obtain a dependency structure of the text by determining the probability of dependency of the entire text by applying a statistical technique using a dependency model, thereby generating a text having a maximum probability as the optimum text.*”

Independent claim 7 recites “[a] text generation apparatus for generating *a text of a sentence*, comprising: input means for inputting at least one word as a keyword, extracting means for extracting *a text including one or more keywords* from a database, and text generation means for generating an optimum text by using the extracted text, wherein *parser means morphologically analyzes and parses the extracted text to obtain a dependency structure of the text by determining the probability of dependency of the entire text by applying a statistical technique using a dependency model, thereby generating a text having a maximum probability as the optimum text.*”

Applicants respectfully submit that the above combinations of steps and elements as set forth in independent claims 1 and 7 are not disclosed nor suggested by the reference relied on by the Examiner.

In the specification, Japanese examples are written using English alphabets. For the illustration purpose, the following examples are explained with English translation and Chinese/Japanese characters.

When “彼女(She)”, “公園 (park)”, and “行った (went)” are input as keywords in an input step, texts of “彼女 (kanojo) は (wa) , 公園 (koen) へ (e) 行った (itta) <She went to a park>”, “彼女 (kanojo) の (no) 公園 (koen) へ (e) 行った (itta) <... went to her park>”, etc. are extracted in an extracting steps. Subsequently, an optimum text of “彼女 (kanojo) は (wa) , 公園 (koen) へ (e) 行った (itta) <She went to a park>” is generated in a text generation steps based on a result of morphological analysis and a dependency structure parsed by the morphological analysis. See page 3, lines 7-19 of the specification.

However, Micher simply teaches a linguistic retrieval system to predict a word. The Examiner in the outstanding Office Action alleged that if the words including the selected word chunk include other words including an additional identifier identifying a next word chunk, the system will display these new word chunks up to what essentially is a second predetermined identifier. However, Micher in col. 10, lines 12-41 states that, as can be seen by the example shown in FIG. 4a, by inputting a single character “z”, the user can find a word beginning with a word chunk such as zeit, zahn, zwei, and a word such as ziehen, zwischen, zarter. Thereafter, as shown in FIG. 4b, when the user selects the word chunk “zeit”, the displayed character “z” is replaced with the word chunk “zeit”, ending in a tilde. Thereafter, the word prediction continues using the word chunk “zeit”, and the microprocessor searches the database for a word or word chunks beginning with “zeit”.

In other words, Micher merely generates a word such as ziehen, zwischen, zarter and a word chunk such as zeit, zahn, zwei based on an input character “z”, or a word “zeit” to have a related word(s). Micher neither teaches nor suggests generating a text including a sentence by input a word. Micher also fails to teach “*parser means morphologically analyzes and parses the extracted text to obtain a dependency structure of the text by determining the probability of dependency of the entire text by applying a statistical technique using a dependency model, thereby generating a text having a maximum probability as the optimum text*” as recited in claims 1 and 7. It makes sense because Micher has no purpose to generate a natural text or sentence from at least one keyword.

Since Micher fails to teach each and every limitation of independent claims 1 and 7, Applicants respectfully submit that claims 1 and 7 and their dependent claims clearly define over the teachings of Micher. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 102 are respectfully requested.

### **CONCLUSION**

It is believed that a full and complete response has been made to the Office Action, and that as such, the Examiner is respectfully requested to send the application to Issue.

In the event there are any matters remaining in this application, the Examiner is invited to contact Joe McKinney Muncy, Registration No. 32,334 at (703) 205-8000 in the Washington, D.C. area.

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If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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